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Attorneys for Santa Cruz Valley USD #35

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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (RIO RICO
WATER & SEWER) CORP., AN ARIZONA
CORPORATION, FOR A
DETERMINATION OF THE FAIR VALUE
OF ITS UTILITY PLANTS AND
PROPERTY AND FOR INCREASES IN ITS
WATER AND WASTEWATER RATES
AND CHARGES FOR UTILITY SERVICES
BASED THEREON,

NO. WS-02676A-15-0368 &
WS-02676A-15-0371
W-02465A-15-0367
W-02465A-15-0370

CONSOLIDATED

**SANTA CRUZ VALLEY UNIFIED
SCHOOL DISTRICT #35'S
APPLICATION TO INTERVENE**

The SANTA CRUZ VALLEY UNIFIED SCHOOL DISTRICT #35, a political subdivision of the State of Arizona ("School District"), respectfully applies for leave to intervene in this proceeding pursuant to A.A.C. R-14-3-105.

I. The School District Should Be Granted Intervention.

Pursuant to R-14-3-105(A), persons who are "directly and substantially affected by the proceedings" may apply to intervene. The School District, on information and belief, is one of the larger customers of Liberty Utilities Corp.; the School District operates several campuses with 3,400 students, plus several hundred additional faculty and staff. Therefore, as one of Rio Rico's Utilities' larger customers, it is directly and substantially affected by a Decision or Order of the Commission in this matter. Furthermore, most of the School District's students, faculty and employees are customers of Rio Rico Utilities and those customers will be directly and substantially affected by a Decision or Order of the Commission in this matter.

Arizona Corporation Commission

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MAR 31 2016

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1 **II. Contact Information**

2 Copies of all documents, pleadings and pre-filed testimony, and all data requests
3 or other requests for information, should be directed to the School District's counsel:

4 Roger C. Decker
5 UDALL SHUMWAY PLC
6 1128 N. Alma School Road, Suite 101
7 Mesa, Arizona 85201
rcd@udallshumway.com


8 **III. Conclusion**

9 It is not anticipated that granting the School District's Motion to Intervene will
10 unduly broaden any issue before the Commission.

11 For the foregoing reasons, the Santa Cruz Valley Unified School District #35
12 respectfully requests that the Commission issue a procedural order granting the District
13 intervention in this case.

14 RESPECTFULLY SUBMITTED this 31st day of March, 2016.

15 UDALL SHUMWAY PLC

16
17 By 
18 Roger C. Decker
19 1138 North Alma School Road
20 Suite 101
21 Mesa, AZ 85201
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22 Original plus 13 copies of the of the
23 foregoing filed this 31st day of March,
24 2016, with:

25 Docket Control
26 Arizona Corporation Commission
27 1200 W. Washington Street
28 Phoenix, AZ 85007

1 Copies mailed to this 3/16 day of
2 March, 2016, to:

3 Dwight Nodes
4 Hearing Division
5 Arizona Corporation Commission
6 1200 West Washington
7 Phoenix, AZ 85007

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